

**IN THE WEST VIRGINIA SENATE
SECOND EXTRAORDINARY SESSION**

2018

IN RE: The Matter of Impeachment Proceedings
Against Respondent Chief Justice Margaret Workman

**HOUSE OF DELEGATES' RESPONSES TO THE RESPONDENT'S REQUEST FOR
DISCOVERY**

WRITTEN/RECORDED STATEMENTS OF THE RESPONDENT

1. Please see Exhibit No. 80
2. <https://www.youtube.com/watch?v=qoJZ8cXHO48>

The Board of Managers reserves the right to amend and/or supplement its response to this request.

EXHIBITS

1. Exhibit Nos. 1-74 which can be found on the West Virginia Legislature's website.
2. Exhibit Nos. 75-101 attached hereto.
3. <https://www.youtube.com/watch?v=qoJZ8cXHO48>

The Board of Managers reserves the right to amend and/or supplement its response to this request.

WITNESS LIST

1. Justice Allen Loughry
2. Justice Elizabeth Walker
3. Chief Justice Margaret Workman
4. Retired Justice Robin Davis

5. Former Justice Menis Ketchum
6. Former Justice Brent Benjamin
7. Senior Status Judge Thomas Keadle
8. Judge John Henning
9. Auditor John B. McCuskey and/or his designee
10. Arthur Gene Angus
11. Jennifer Bundy
12. Paul Fletcher Adkins
13. Steven Dane Canterbury
14. Kim Ellis
15. Sue Racer-Troy
16. Justin Robinson
17. Aaron Allred
18. Melissa Bishop
19. Adam Fridley
20. Michael Proops
21. Chris Workman
22. Kathleen Gross
23. Shannon Green
24. Kennie Bass
25. Susan Johnson
26. Sandra Johnson
27. Edward E. Weber
28. David R. McCarty
29. Representatives of Geiger Brothers Inc.
30. Jerry Belcher
31. Representatives of Window Fashions
32. Scott E. Harvey
33. Barbara Allen
34. Representatives of the Capitol Building Commission

The Board of Managers reserves the right to amend and/or supplement its response to this request.

EXPERT WITNESSES

The Board of Managers reserves the right to disclose expert witnesses.

A handwritten signature in blue ink that reads "JOHN H. SHOTT" with a stylized flourish at the end.

JOHN H. SHOTT
Board of Managers
WV House of Delegates
1900 Kanawha Boulevard, East
Room M-418
State Capitol Complex
Charleston, WV 25305

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Against Respondent Chief Justice Margaret Workman

CERTIFICATE OF SERVICE

I, JOHN H. SHOTT, on behalf of the Board of Managers, do hereby certify that the foregoing "*House of Delegates' Responses to the Respondent's Request of Discovery*" has been upon the following individuals this 7th day of September, 2018, by hand delivering a true and exact copy thereof as follows:

Benjamin L. Bailey
Steven Robert Ruby
Bailey & Glasser, LLP
209 Capitol Street
Charleston, WV 25301
Via electronic mail

Lee Cassis
Clerk of the West Virginia Senate
1900 Kanawha Boulevard, East
Room M-211
State Capitol Complex
Charleston, WV 25305
Via electronic mail



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Board of Managers
WV House of Delegates
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